Evaluation and Certification
ABAR-W375-00-00013

This ABAR proposes the modifications of standards for Process Safety Management currently contained in the SRD, QAPIP, and ISMP. Specifically, the changes include the following:

Revise the definition of Safety Design Class in SRD SC 1.0-8 and 2.0-2, QAPIP Section 1.2.1, and ISMP Section 12 from ERPG-2 to workers or the public to ERPG-2 to the public, ERPG-3 to the co-located worker, or a single worker fatality or hospitalization of 3 or more workers. Provide for use of TEEL values as substitute criteria in cases where no ERPG value has been published.

Replace ISMP with SRD Appendix A as an implementing standard for SRD SC 1.0-1, 3.1-1, -2, -3, -4,-5, -8.

Remove references to 29 CFR 1910.119 and/or 40 CFR 68 as regulatory bases in SRD SC 1.0-1, 3.1-1, -2, -3, -5, -6, -7, -8, 4.0-2, 4.5-23, 6.0-1, -5, 7.1-1, -2, 7.2-3, -3, -5, -6, -7, -8, 7.3-7, -10, -11, 7.6-2, -4, 7.7-1, -2, -3, 7.8-1, -2, -5, 9.1-7, and ISMP Sections 1.3.16, 1.3.17, 3.10, 5.0, 5.6.8, 7.2, and 9.2.

Delete SRD Section 9.3

Revise SRD SC 3.1-1 to specify chemical hazards must be included in the PHA.

Revise SRD SC 3.1-2 to allow compilation of process safety information appropriate to the level of design, to support the PHA.

Revise the update frequency for PHA specified in SRD SC 3.1-7, and ISMP Sections 5.6.2 and 9.2 from once every 5 years to annual.

Revise the seismic design criteria in SRD SC 4.1-3 and 4.1-4, and ISMP Section 1.3.10 for SSC's designated SDC on the basis of chemical consequences from SC-I/II to SC-III.

Revise the chemical concentration limits specified in SRD SC 4.3-7for control room habitability from ERPG-2 to the values specified in 29 CFR 1910.120, and add 29 CFR 1910.120 to the list of regulatory bases.

Include chemical hazards in the definition of USQ specified in SRD SC 7.4-1, and ISMP Section 3.16.4.

Revise the scope of the Hazards Identification specified in SRD Appendix A, Section 4.3.1 to include chemical hazards.

Revise the discussion of control room habitability in SRD Appendix A, Section 5, and ISMP Section 1.3.7 and 8 to be consistent with changes made to SRD SC 4.3-7.

Tables 1 and 2, below, specify each proposed change and provide the reason for the change. The evaluation that concludes the proposed changes provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards is provided in the text following the tables. Although the text pertains specifically to the changes proposed for the SRD, the rationale applies equally to the other two documents, the ISMP and the QAPIP. These documents will be revised at the same time the SRD is revised, via the same ABAR.

Table 1. Changes to the SRD Requirements for the PSM Program

Proposed Change	Reason for Change
SC 1.0-1 Replace ISMP Chapter 5.0 and Section 4.1with SRD Appendix A as an implementing standard. Delete 40 CFR 68 and 29 CFR 1910.119 as regulatory basis documents.	Appendix A should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to process hazards analysis. 29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 1.0-8 Revise the definition of Safety Design Class to show ERPG-3 concentrations for the co-located worker, and concentrations that could reasonably be expected to results in either a single worker fatality or require in-patient hospitalization of 3 workers or more. Definition of SDC for members of the public remains unchanged. Provide for use of TEEL concentrations where no ERPG has been published.	The threshold value for co-located workers should be increased to be consistent with recommended usage of the ERPG's for emergency planning. The threshold value for facility workers should be increased to be consistent with OSHA requirements regarding the immediate reporting of serious accidents. Several chemicals planned for use at WTP do not have ERPG data, therefore an equivalent value is needed and TEEL will be itilized.
SC 2.0-2 See SC 1.0-8, above.	SC 2.0-2 See SC 1.0-8, above.
SC 3.1-1 Revise the criterion to clarify that the process hazards analysis must consider both radiological and chemical hazards. Replace the ISMP with Appendix A of the SRD as the implementing standard. Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	The text of the standard should be revised for clarification and consistency with the proposed implementing standard. This standard requires that both chemical and radiological hazards be evaluated in the standards identification process. Appendix A should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to process hazards analysis. 29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 3.1-2 Revise text to require compilation of process safety information appropriate to the stage of design, to support the PHA. Replace the ISMP with Appendix A of the SRD as the implementing standard.	Requiring acquisition of all process safety information prior to implementation of the Hazards Identification step of the ISM process often causes undue delays in standards identification. Appendix A

Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to process safety information. 29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 3.1-3 Replace the ISMP with Appendix A of the SRD as the implementing standard. Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	Appendix A should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to process hazards analysis. 29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 3.1-4 Replace the ISMP with Appendix A of the SRD as the implementing standard.	Appendix A should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to process hazards analysis.
SC 3.1-5 Replace the ISMP with Appendix A of the SRD as the implementing standard. Remove reference to 29 CFR 1910.119 as the regulatory basis.	Appendix A should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to employee participation in the process hazards analysis. 29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 3.1-6 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
3.1-7 Revise PHA update interval to once every year. Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	The interval for revision of the chemical portions of the PHA should be consistent with the interval for revision of the radiological portion, since the same PHA

	covers both hazard types. 29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
3.1-8 Replace the ISMP with Appendix A of the SRD as the implementing standard. Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	Appendix A should replace the ISMP as the implementing standard because Appendix A provides more definitive requirements pertaining to the disposition of process hazards analysis results (ie., incorporate them into the SARs). 29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
4.0-2 Remove reference to 29 CFR 1910.119 as the regulatory basis.	29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
4.1-3 Revise the seismic standard to specify SC-III for chemical systems.	The designation of SC-I and II is intended to address hazards that are significantly larger at WTP than they are in the non-nuclear industry (ie., the large radioactive material inventories). Therefore a seismic design standard needed to be developed specifically for the nuclear industry. This standard was not intended to be applied to the chemical hazards at WTP. The chemical hazards routinely encountered in the chemical industry are significantly larger both in toxicity and amounts than those present at WTP. These non-nuclear industries have developed seismic design requirements to deal with these chemical hazards. These requirements are embodied in the Uniform Building Code, which is implemented at WTP as Seismic Category III, as augmented.
SC 4.1-4 Revise to include chemical hazards.	See reason for revisions to SC 4.1-3 above.

SC 4.3-7 Revise to require that worker exposure not exceed concentrations specified in 29 CFR 1910.120.	The ERPG-2 value is inappropriate for purposes of control room habitability. The correct standard should be the standards for emergency exposures specified in 29 CFR 1910.120.
SC 4.5-23 Remove reference to 29 CFR 1910.119 as the regulatory basis.	29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 6.0-1 Remove reference to 29 CFR 1910.119 as the regulatory basis.	29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 6.0-5 Remove reference to 29 CFR 1910.119 as the regulatory basis.	29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 7.1-1 and –2 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 7.2-3 through 7.2-8 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 7.3-7 and –11 Remove reference to 29 CFR 1910.119 as the regulatory basis.	29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 7.3-10 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the

	threshold quantities listed in the rules.
SC 7.4-1 Revise text to include chemical hazards in the USQ process.	The WTP has elected to manage radiological, nuclear and process safety as a single integrated program. Therefore, the existing USQ program has been modified to implement the PSM aspect of Management of Change.
SC 7.6-2 Remove reference to 29 CFR 1910.119 as the regulatory basis.	29 CFR 1910.119 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 7.6-4 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 7.7-1, -2, and –3 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 7.8-1, and –5 Remove reference to 40 CFR 68 as the regulatory basis.	40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
SC 7.8-2 Remove reference to 29 CFR 1910.119 and 40 CFR 68 as the regulatory basis.	29 CFR 1910.119 and 40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of either of these rules. None of the chemicals contained in the facility exceed the threshold quantities listed in the rules.
SC 9.1-7 Remove reference to 40 CFR 68 as the regulatory basis.	40 CFR 68 should be deleted because WTP is currently not required to implement the requirements of this rule. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.
Section 9.3 Delete the entire chapter.	WTP is currently not required to implement the requirements of 40 CFR 68. None of the chemicals contained in the facility exceed the threshold quantities listed in the rule.

Appendix A, Section 4.3.1 Revise to be more specific about the scope of the chemical hazards assessment.	The ISM process requires that chemical hazards be included as potential initiators of radiological events, as well as hazards in their own right.
Appendix A, Section 5.0 Revise discussion of ERPG concentrations.	Revision is needed to be consistent with revisions made to SC 1.0-8.

Table 2. Changes to the QAPIP and ISMP

Proposed Change	Reason for Change
QAPIP Section 1.2.1 Revise definition of Safety Design Class.	Revision is needed to conform to SRD definition.
ISMP Section 1.3.7 Delete references to ERPG-2 and revise specification for control room habitability.	Revision is needed to conform to corresponding changes to the SRD.
ISMP Section 1.3.8 Delete references to ERPG-2 and revise specification for control room habitability	Revision is needed to conform to corresponding changes to the SRD.
ISMP Section 1.3.10 Exclude chemical safety SSC's from SC-I/II criteria.	Revision is needed to conform to SRD allocation of seismic design requirements for chemical safety.
ISMP Section 1.3.16 Delete reference to 29 CFR 1910.119.	Requirements of 29 CFR 1910.119 do not apply to WTP, since there are no threshold chemicals present.
ISMP Section 1.3.17 Delete reference to 29 CFR 1910.119.	Requirements of 29 CFR 1910.119 do not apply to WTP, since there are no threshold chemicals present.
ISMP Section 3.10 Delete reference to 29 CFR 1910.119 and 40 CFR 68.	Requirements of 29 CFR 1910.119 and 40 CFR 68 do not apply to WTP, since there are no threshold chemicals present.
ISMP Section 3.16.4 Include chemical hazards in definition of USQ.	Revision is needed to conform to SRD definition.
ISMP Section 5.6.2 Revise update requirements for HAR to annually.	Revision is needed to conform to SRD requirement to update PHA.
ISMP Sections 5.0 and 5.6.8 Delete reference to 40 CFR 68.	Requirements of 29 CFR 1910.119 and 40 CFR 68 do not apply to WTP, since there are no threshold chemicals present
ISMP Section 7.2 Delete reference to 29 CFR 1910.119	Requirements of 29 CFR 1910.119 do not apply to WTP, since there are no threshold chemicals present
ISMP Section 9.2 Revise update requirements for the HAR and delete reference to 29 CFR 1910.119 and 40 CFR 68.	Revision is needed to conform to SRD requirement to update PHA. Requirements of 29 CFR 1910.119 and 40 CFR 68 do not apply to WTP, since there are no threshold chemicals present.
ISMP Section 12.0 Revise definition of	Revision is needed to conform to SRD

Safety Design Class.	definition.

A. **Evaluation.**

Provision of Adequate Safety

Removal of the citations of 29 CFR 1910.119 and 40 CFR 68 as regulatory bases for the several safety criteria listed in the Tables above is being proposed because WTP does not contain the threshold quantities of chemicals that would trigger application of the programs required by these rules. Therefore these rules do not form the regulatory basis for the WTP's PSM program, or for the Risk Management Plan. This same rationale explains the changes proposed to SRD Section 9.3. The basis for the PSM program continues to be the requirements for the PSM program specified in DOE/RL-96-0006, Chapter 5. The revisions to the standards in the SRD do not affect the SRD's application of the correct regulatory basis document, and it is concluded these revisions do not affect the PSM program.

Replacement of cited sections of the ISMP with the SRD Appendix A as the implementing standard for safety criterion 1.0-1, 3.1-1, -2, -3, -4,- and –5, and 3.1-8 provides an implementing standard for these criterion that is more detailed. Additionally, the proposed new implementing standard more explicitly aligns the PSM program with the ISM process. Adoption of the new implementing standard does not affect the PSM program specified in the SRD other than to make the implementation details of certain elements of the program more clear.

Revision of the definition of "Safety Design Class" in SC's 1.0-8 and 2.0-2 is being proposed to bring the WTP PSM program more into line with commercial practice. The chemical industry currently does not recognise the term "Safety Design Class" (SDC). However both the industry and it's regulators (OSHA and EPA) do recognise the existence of a level of potential harm to workers and the public that warrants special consideration. Hence, for example, the PSM rule. Despite the fact that the PSM rule (per se) does not require implementation of a PSM program, WTP has elected to impose special design and operations requirements to chemicals that could conceivably pose undue risk to workers or to the public. This is done by applying the concept of "Safety Design Class" to structures, systems, and components (SSCs) used to protect workers and the public from significant chemical hazards. Application of the SDC category to WTP SSC's should, however, be comparable to levels of chemical hazards that, in commercial industry, represent a high level of concern. These levels of concern are proposed to be the ERPG-3 concentration at locations nearby the WTP (ie., at the co-located worker), ERPG-2 concentrations at locations more distant from the facility (ie., at the location of the public), or worker injury grave enough to trigger the emergency notification requirements of 29 CFR 1904.8 *Reporting of fatality or multiple hospitalization incidents.* By revising the definitions of SDC, the WTP is more consistent with commercial chemical industry practice, and continues to provide adequate safety to workers and the public. Several of the chemicals planned for use at WTP do not have published ERPG values. The DOE Subcommittee on Consequence Assessment and

Protective Action (SCAPA) has published Temporary Emergency Exposure Limits (TEELs) for chemicals that as yet do not have published ERPG values. The TEELs are equivalent to ERPG (e.g., TEEL-3 = ERPG-3).

Revision of the requirement in SC 3.1-2 to collect all process safety information before conducting the PHA is proposed to enable better integration of the PSM program with the WTP overall ISM requirements. The purpose of ISM is to design in safety. Therefore, the Hazard Identification (or PHA) portion of ISM is often started using incomplete, or draft information. Some of the information required by SC 3.1-2 (e.g., analysis of consequences of deviation) is not available until after conducing the PHA. However, before the ISM process is completed, all of the information required by the SC 3.1-2 will have been developed. Therefore, the proposed revision does not affect the standard's ability to provide adequate safety.

Revision of the update interval for the Process Hazards Analysis (PHA) in SC 3.1-7 from the current 5 years to 1 year is proposed to provide better integration between the WTP's Radiological/Nuclear Safety and its PSM programs. Since the PHA scope includes both nuclear and chemical hazards, it makes sense to update both aspects at the same time. This change does not affect the ability of the standards to provide adequate safety.

Revision of the seismic design requirements specified in SC's 4.1-3 and 4.1-4 is proposed to make the design of the WTP, with respect to chemical hazards, consistent with commercial industry practice. Seismic Category I and II were developed to provide design requirements for SSC's needed to protect workers and the public from hazards not normally encountered in the chemical industry. These are the radiological hazards unique to (in this case) a nuclear waste processing plant. The chemical industry has proven seismic design requirements for SSC's needed to protect workers and the public from chemical hazards, many of which far exceed the chemical hazards at the WTP. These design requirements are contained in the Uniform Building Code. The UBC forms the basis for Seismic Category III. Therefore it is proposed the WTP adopt Seismic Category III as the governing standard for seismic design of SSC's related to chemical hazards. By revising the seismic design criteria in the SDC, the WTP is more consistent with commercial chemical industry practice, and continues to provide adequate safety to workers and the public.

Safety Criterion 4.3-7 has been revised to be consistent with the requirements of 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER). This rule establishes maximum allowable concentrations of hazardous chemicals in the workplace under emergency conditions. These concentrations are equal to or less than ERPG-2 levels. Concentrations above these limits require personal protective equipment even for short term exposures. Therefore SC 4.3-7 continues to provide adequate safety.

The proposed revisions to Appendix A provide added clarity to the integration of PSM with the Radiological/Nuclear safety programs (Section 4.3.1), and bring the discussion of ERPG concentrations in Section 5.0 into line with the revisions proposed for SC 1.0-8 and 2.0-1. These revisions do not affect the standard's provision for adequate safety.

Compliance with applicable laws and regulations.

Laws and regulations potentially affected by the proposed changes to the SRD include 29 CFR 1910.119 and .120, 40 CFR 68, and the Uniform Building Code. WTP remains fully compliant with these laws and regulations.

Conformance to top-level safety standards.

The top-level safety standards applicable to the proposed changes to the SRD are those cited as regulatory bases in the various Safety Criteria proposed for revision in Table 1. Table 3 provides the title or subject of each top-level safety standard so cited, and a brief discussion showing that conformance to the standard is maintained.

Table 3. Conformance to Top-level Safety Standards DOE/RL-96-0006

Top-level standard	Safety Criterion	Statement of conformance
3.3.1 Public Protection	1.0 - 8	The SRD remains unchanged w/r to this top-level standard.
3.3.2 Worker Protection	1.0 – 8	The approach proposed to evaluate the design w/r to worker safety is consistent with acceptable industry practice, as evidenced in the discussion provided in the preceding sections of this evaluation.
3.3.3 Accident Vulnerability Mitigation	3.1 - 4	The SRD remains unchanged w/r to this top-level standard. A new, more comprehensive implementing standard is proposed.
4.1.2.3 Safety Responsibility – Site and Technical Support	7.8 - 2	The SRD remains unchanged w/r to this top-level standard.
4.2.2.2 Proven Engineering Practice -	4.1 –3, -4	Substitution of the UBC seismic requirements for SSCs designed against chemical hazards is consistent with proven engineering practice, as evidenced by the discussion in the preceding sections of this evaluation.
4.2.4.1 Emergency Preparedness – Support Facilities	4.3 - 7	The SRD remains unchanged w/r to this top-level standard, in that the maximum allowable concentrations of hazardous chemicals in the control room under accident conditions remain at safe levels.
4.2.6.2 Human Factors – Instrumentation Control and Design	4.3 - 7	The SRD remains unchanged w/r to this top-level standard, in that the maximum allowable concentrations of hazardous chemicals in the control room under

		accident conditions remain at safe levels.
4.2.8.1 Preoperational Testing – Testing Program	6.0 - 1	The SRD remains unchanged w/r to this top-level standard.
4.3.1.4 Conduct of Operations - Readiness	6.0 - 5	The SRD remains unchanged w/r to this top-level standard.
4.3.2.2 Radiation Protection – Procedures and Monitoring	7.2 - 5	The SRD remains unchanged w/r to this top-level standard.
4.3.3.1 Emergency Preparedness – Offsite Measures	7.8 - 5	The SRD remains unchanged w/r to this top-level standard.
4.3.4.1 Training and Qualification – Personnel Training	7.2 - 3	The SRD remains unchanged w/r to this top-level standard.
4.3.4.3 Training and Qualification – Conditions Beyond the Design Basis	7.2 - 3	The SRD remains unchanged w/r to this top-level standard.
4.3.5.1 Operational Testing, Inspection, and Maintenance	7.6 – 2, -4	The SRD remains unchanged w/r to this top-level standard.
4.4.4 Unresolved Safety Questions	7.4 - 1	The SRD remains unchanged w/r to the radiological/nuclear safety aspects of this top-level standard. The safety criterion (7.4 – 1) has been revised to clarify it's applicability to chemical hazards as well.
5.1.1 Process Safety Management	1.0 - 1	The SRD remains unchanged w/r to its implementation of this top-level standard. A new, more comprehensive implementing standard is proposed.
5.1.2 Process Safety Objective	1.0 - 1	The SRD remains unchanged w/r to its implementation of this top-level standard. A new, more comprehensive implementing standard is proposed.
5.2.1 Process Safety Information	3.1 - 2	The full suite of process safety information is still required, however the safety criterion has been modified to be more compatible with an emerging design and the cyclic nature of the ISM process. A new, more comprehensive implementing standard is proposed.
5.2.2 Process	3.1 – 1, -2, -3, -4, -	The SRD remains unchanged w/r to this

Hazard Analysis	6, -7	top-level standard. A new, more comprehensive implementing standard is proposed.
5.2.3 Operating Procedures	7.2 - 5	The SRD remains unchanged w/r to this top-level standard.
5.2.4 Training	7.2 - 3	The SRD remains unchanged w/r to this top-level standard.
5.2.5 Subcontractors	7.1 - 2	The SRD remains unchanged w/r to this top-level standard.
5.2.6 Pre-startup Safety Review	6.0 - 5	The SRD remains unchanged w/r to this top-level standard.
5.2.7 Mechanical Integrity	7.6 - 4	The SRD remains unchanged w/r to this top-level standard.
5.2.8 Hot Work Control	4.5 - 23	The SRD remains unchanged w/r to this top-level standard.
5.2.9 Management of Change	4.0 – 2, 7.4 - 1	The SRD remains unchanged w/r to the radiological/nuclear safety aspects of this top-level standard. The safety criterion (7.4 – 1) has been revised to clarify it's applicability to chemical hazards as well.
5.2.10 Incident Investigation	7.7 – 1, -2, - 3	The SRD remains unchanged w/r to this top-level standard.
5.2.11 Emergency Planning and Response	7.8 - 2	The SRD remains unchanged w/r to this top-level standard.
5.2.12 Compliance Audits	7.3 - 10	The SRD remains unchanged w/r to this top-level standard.

B. Certification of SRD Changes

The SRD continues to identify a set of standards that, when implemented, will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

Certification that the revised SRD identifies a set of standards that continues to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards is based on adherence to the DOE/RL-96-0004 Standards Identification Process and successful completion of review and confirmation by the PSC.

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WTP General Manager/Designee – Approval Date